UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

IN RE: **Chapter: 13**
Case No.: 17-30369

JOHN RICHARD MAYNARD, JR.

SSN: xxx-xx-5563
Debtor.

APPLICATION FOR APPROVAL OF BASE AND NON-BASE FEES ON A TIME AND EXPENSE BASIS

David R. Badger of the firm of David R. Badger, P.A., Attorney for the Debtor, moves the Court for approval of payment of base and non-base fees on a time and expense basis in lieu of standard base and non-base fees in this case in accordance with 11 U.S.C. §330 and Local Rule 2016-2(e)(2), and in support thereof shows:

1. John Richard Maynard, Jr. (hereinafter "Debtor") filed this Chapter 13 proceeding on March 9, 2017;

2. Debtor has been engaged in a contentious domestic case with his former spouse for over two years. Among the issues at hand is a dispute satisfying the terms set forth in the domestic Consent Order. It is reasonably anticipated that resolving the issues surrounding the domestic case will require significantly more time than a standard Chapter 13 case.

3. Your applicant believes that billing on a time and expense basis is necessary as the projected time and cost is expected to far exceed the standard base and non-base fees awarded.

WHEREFORE, your applicant moves the Court to approve the billing of base and non-base fees on a time and expense basis in lieu of the standard base and non-base fee award in accordance with 11 U.S.C. §330 and Local Rule 2016-2(e)(2).

Dated: ________________ _/s/______________________________

David R. Badger
Attorney for Debtor
N.C. State Bar #156
DAVID R. BADGER, P.A.
2108 South Boulevard
Suite 118 Atherton Lofts
Charlotte, North Carolina 28203
Telephone No.: (704) 375-8875

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NOTICE OF FILING OF PLEADING/NOTICE OF HEARING

The attached pleading has been filed with the court.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to contact one.)

TAKE NOTICE that a hearing to consider said Application for Approval of Attorney's Fee will be held before the United States Bankruptcy Judge at **2:00 p.m.**, on Tuesday, **May 9, 2017** in the U.S. Bankruptcy Court, 401 West Trade Street, Charlotte, North Carolina 28202. All interested parties may attend and be heard.

Dated: ________________ _/s/________________________________

David R. Badger
Attorney for Debtor
N.C. State Bar #156
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CERTIFICATE OF SERVICE

The undersigned certifies that he has this date served a copy of the **Application for Approval of Base and Non-Base Attorney's Fees on a Time and Expense Basis** on all parties listed below and per the attached matrix by depositing same with the United States Postal Service, postage pre-paid and addressed via CertificateofService.com as follows:

John R. Maynard, Jr.
P.O. Box 152
Mount Holly, NC 28120

The undersigned further certifies that he has this date served a copy of the **Application for Approval of Base and Non-Base Attorney's Fees on a Time and Expense Basis** on all parties listed below by electronic case filing:

Linda W. Simpson, Bankruptcy Administrator
Warren L. Tadlock, Chapter 13 Trustee

Dated: ____________________

_/s/____
David R. Badger
Attorney for Debtor
N.C. State Bar #156
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